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# Scientific Research Associates, Inc.

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April 16, 1991

Mr. Sidney Jackson  
Office of Pesticide Programs - H7504C  
U.S. Environmental Protection Agency  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Re: Pentachlorophenol Data Call-In and Reregistration  
- Definition of Material to be Tested  
- Phase 4 Response Date

Dear Mr. Jackson:

In numerous correspondence (most recently, Bernard to Jackson, 1/14/91) I have continuously and regularly notified the EPA that the Pentachlorophenol Task Force (PTF) has not received a response from the Agency concerning the composition of the test material to be employed in studies required under the Data Call-In or reregistration of pentachlorophenol. To date, we still have received no response from EPA on this issue, and I reiterate that in the absence of direction from the Agency, no studies which employ the TGAI as the test material can be initiated.

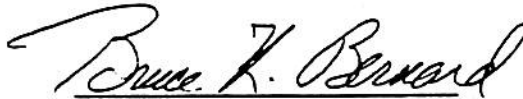
Recently, an article in "Chemical Regulation Reporter" (14, 1/26/91, pp. 1521, 1541-3) was brought to my attention. In that publication, Allan Abramson, acting director of the EPA Special Review and Reregistration Division, indicated that EPA expects to complete its review of data for all List B chemicals (which includes pentachlorophenol) by June 1991. As this proposed completion date is only 2 months from now, we are anxious to hear from the Agency on the TGAI issue.

This letter again reinforces the commitment of the PTF to satisfy the requirements of both the Data Call-In and the reregistration procedures for pentachlorophenol. However, we remind the Agency that the issuance of the long delayed Data Call-In Phase 4, in the absence of a decision on the definition of the TGAI, will continue to prevent initiation of studies for which monies were collected and have been available for well over a year.

Bernard to Jackson  
Penta DCI/Reregistration  
4/16/91; p. 2

I will plan to contact you or Susan Lewis within the next week regarding the status of the data review.

Sincerely,

A handwritten signature in cursive script, reading "Bruce K. Bernard".

Bruce K. Bernard, Ph.D.  
Authorized Representative  
Pentachlorophenol Task Force

BKB/jaa

cc: S. Lewis  
C. Rice  
B. Litt  
C. Norman  
J. Wilkinson